



# TECHNICAL RESOURCE SERVICES

July 8, 1999



Department of the Interior  
Minerals Management Service  
Mail Stop 4024  
381 Eden St.  
Herndon, VA 20170-4817  
ATT: Rules Processing Team

RE: Comments on 30 CFR Part 250 Subpart O Proposed Rule

Dear Sirs:

Presently I am President of Technical Resource Services Inc., a professional safety and environmental consulting and training corporation in existence since 1991. Personally I started working in the OCS for Exxon USA in 1972 and completed my first T-2 course in 1980. I have been instructing t2 Production Safety Systems training since 1988 and presently have an approved school. I have been involved directly in the field of safety for twelve years. I am a Certified Safety Professional, which is the highest credential one can receive in the field of safety today. There are only about 7,000 CSP's as of today. I have personally trained over 1,000 students in T-2 over the past eleven years. I would like to comment on a number of issues:

1) Eliminating prescriptive training requirements. I feel that prescriptive training requirements in its present form should be maintained to ensure a safe workplace. Though there is always room for improvement (14 fatalities in 1998) the industry's safety record has improved overall and one of the reasons is the prescriptive training requirements. Why fix a process that works. Just because some of the oil companies would like to train personnel once a lifetime or would like to utilize an unproven training method does not mean the industry should change. If those companies are concerned about cost; what do think the cost would be to clean up spills, or replace a burned platform or the probable high incidence of injuries and deaths; not to mention the escalation of insurance costs to industry and the damage to the image of the industry. I feel the MMS should assume a more active role in ensuring a safe workplace and clean environment and should continue the present policy similar to the USCG accreditation process. I can assure you with the proposed regs some companies will spend less time training and the training would probably be inferior unless they are regulated. Profits drive most companies and most will do what they can to get by. MMS could allow for more flexibility in training methods under the present structure. Note that training is not equal there are presently some poor training given in the name of T-2. This proposal will place an unnecessary burden on the MMS (tax payers money) to review training plans of those poor performers (this definition has not been clearly defined).

The MMS is taking a reactive rather than a proactive approach to safety which is wrong. Under the proposed guidelines if a company commits a high number of INC's or suffers accidents or fires, spills, etc. then the MMS will review the training plans of that company. Training plans should be reviewed and approved as well as periodically audited by the MMS to ensure a safe OCS. Companies failing to follow approved training plans should be subject to serious fines and penalties.

2) Performance based testing implementation. I support performance based testing so long as it is done fairly and properly. Written testing as well as hands on testing should be conducted unannounced periodically to all personnel within a three year period.

Testing must reflect the actual job duties of the worker. Workers could be classified under certain levels of job classifications and tested accordingly. For example, a Level "C" Operator would need to know ;how to activate the ESD; understand pollution regs; hot work permitting; abnormal operating conditions & undesirable events; etc. Whereas a Level "A" Operator would know all the applicable safety/environmental regs; testing frequencies; how to install, test, trouble shoot safety systems, SAFE Chart development/process flow, etc. Personnel must be able to attain at least 70% competency on both written and hands on testing. Failures would require the personnel to retake a course before going out on the OCS and to be subsequently tested by the MMS. The MMS must ensure that the tests given are properly written to be understood by the vast majority of the workers and that they are clear and concise. The MMS should make a series of tests including hands on exercises to ensure knowledge acquired and practiced. Tests should consist of 100 questions covering that individual's work responsibilities.

3) Training plan review. MMS should require companies to submit for approval a training plan outlining the requirements for retraining ( should be every three years at least), process for tracking trained personnel, course content (Subpart O); training method. Note the so called "cheap & convenient" training methods such as; OJT training method may be too slow and retention and facilitation may be reduced; CD rom training method could allow for falsification of tests as well as inadequate coverage of training. The MMS should consider the more effective facilitator lecture with equipment demonstrations and practice allowing for some variations. Lessees should be responsible for requiring their contractors to follow their training plan however the contractors should be responsible for ensuring that the training received is proper in accordance with Subpart O.

4) MMS should strongly consider companies following the IADC Wellcap Program as it is an established effective program.

5) MMS should also enforce training requirements found under API RP75 SEMP standard which requires the following training; HAZWOPER, Hazard Communication, First Aid/CPR, Fire Fighting, Water Survival, Lockout Tagout, etc. MMS should also look into the accreditation of those courses similar to the USCG to ensure proper instruction given. This will greatly promote safety and environmental protection as well as reduce insurance rates and create a better image of the industry to ensure continued OSC development.

TRS recognizes that as the lead enforcement agency to ensure protection of personnel, the environment and our natural resources it is a difficult task for the MMS. TRS would like to offer its services to assist the MMS in achieving their goals (i.e. test development; training program audit; test implementation). Our present course for T-2 is the one of the best (instruction, facility, equipment, manual) and it will get better. TRS has recently purchased a production facility (wellhead to pipeline with associated components, safety devices, dump valves, etc.) that will greatly enhance our professional training. TRS plans to develop specific job skill training(i.e. separators, heater treaters, glycol system, LACT, etc) to improve not only production but safety as well. TRS presently provides actual Fire Fighting, Crane Operator and Water survival training at our Broussard facility to serve industry's needs. Should you have any questions concerning this comment please contact me at 318-837-4519.

Safely Yours,



Neil Collins, C.S.P.  
President